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LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

1183

APR 15 1991

REPLY TO ATTENTION OF:

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

5HR-12

RE: QAPjP
U.S. DOE Fernald
OH6 890 008 976

Dear Mr. Craig:

In a May 8, 1990, letter, the United States Environmental Protection Agency (U.S. EPA) provided notice that the March 1988 version of the Quality Assurance Program Plan (QAPjP) must be revised to reflect needed changes that were discussed in several meetings between U.S. EPA and the United States Department of Energy (U.S. DOE). The revised document was to have been submitted within sixty (60) days (July 9, 1990). In a June 18, 1990, telephone conversation and a July 9, 1990, letter, U.S. DOE stated a revision would not be submitted until September 14, 1990. On September 14, 1990, U.S. DOE submitted change pages for proposed revisions to the document.

During an October 5, 1990, tele-conference on another matter, a discrepancy in the QAPP was discovered. Old change pages produced by U.S. DOE's contractors had never been submitted to U.S. EPA. U.S. DOE personnel and contract representatives stated that the version of the QAPjP that the site is currently using is dated February 1989. The version that the United States Environmental Protection (U.S. EPA) approved was revised in March 1988. The later version(s) was not submitted to U.S. EPA for review and approval. The site is required to follow the currently approved QAPjP for all remedial and removal response actions at the site. The fact that U.S. DOE revised and implemented a new QAPjP without approval puts all samples collected and analyzed and data validated under the unapproved revisions in question.

As required in U.S. EPA's October 7, 1990, letter, U.S. DOE was to revise this document and submit it to U.S. EPA by November 7, 1990. U.S. DOE submitted the revision on November 8, 1990. U.S. DOE's transmittal letter (dated November 7, 1990) incorrectly stated that changes to the QAPjP were submitted to U.S. EPA and

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an attachment states that the majority of the revisions were approved. These changes were never submitted to U.S. EPA or the Ohio Environmental Protection Agency.

With a November 15, 1991, letter, U.S. EPA requested that U.S. DOE specify in writing what changes in the work plan were made but not forwarded to U.S. EPA for approval. U.S. DOE responded by withdrawing the QAPP revisions.

On March 1, 1991, U.S. DOE submitted another revised QAPP. U.S. DOE informed U.S. EPA that this submission was also withdrawn. The withdrawal was discussed at the March 14, 1991, meeting with U.S. DOE.

On April 5, 1991, U.S. DOE submitted a letter calling for U.S. EPA's review of the March 1 submittal that was withdrawn. It is unclear why this request was presented. U.S. DOE's request, U.S. EPA has not reviewed U.S. DOE's March 1, 1991, submittal.

U.S. DOE must submit a revised QAPjP within thirty (30) days of the date of this letter. Continued operation under an inadequate QAPjP jeopardizes the quality of remedial and removal data.

Please contact me at (312/FTS) 886-4436, if there are any questions.

Sincerely, .



Catherine A. McCord
Remedial Project Manager

cc: Gerry Ionnaides, Ohio EPA
Graham Mitchell, Ohio EPA
Joe LaGrone, U.S. DOE
Pat Whitfield, U.S. DOE